

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

Andrew Blizzard, *et al.*

Plaintiffs,

v.

Hunter Warfield, Inc., *et al.*

Defendants.

Case No: 1:23-cv-03374-MJM

JOINT MOTION TO MODIFY SCHEDULING ORDER

The parties, by and through their undersigned counsel, hereby request that the Court extend the deadlines set in the Court's September 20, 2024 Scheduling Order (ECF No. 23). Specifically, the Parties request that the Court extend by sixty (60) days all deadlines currently scheduled. In support of their motion, the Parties state as follows:

1. The Court's original Scheduling Order was entered April 23, 2024.
2. On September 19, 2024, the parties filed a Joint Motion to Modify the Scheduling Order and a Request for a Settlement Conference.
3. That Motion was granted on September 20.
4. Pursuant to the September 20 Order, the following deadlines were imposed:

Event	Date
Close of fact discovery regarding Rule 23 class action	December 17, 2024
Plaintiffs disclose experts concerning class certification, if any	December 22, 2024
Defendants disclose experts concerning class certification, if	December 29, 2024
Plaintiffs disclose rebuttal experts concerning class	January 7, 2025
Close of expert discovery concerning class certification, if any	January 28, 2025
Request for admissions deadline	February 4, 2025
Class certification/dispositive motions deadline	March 10, 2025
Parties to submit a report 20 days after the Court rules on class certification and any summary judgment motion(s), proposing a schedule for further	TB D

5. The parties engaged in targeted written discovery. Class certification discovery as to Thornhill Properties, Inc. and Mt. Vernon Mill, LLC is complete. Defendant Hunter Warfield, Inc. (“Hunter Warfield”) has answered Plaintiffs’ written discovery requests, but has encountered difficulty obtaining certain information sought by Plaintiffs that Plaintiffs believe to be necessary to proceed with a corporate designee deposition of Hunter Warfield and their certification claims.

6. There is no scheduled trial date in this matter, and extending the deadlines as requested will not require the scheduling of a new trial.

7. This is the parties’ second request for an extension of the schedule. They do not anticipate having to ask for a further extension.

8. For these reasons, the parties respectfully request that the Court modify the remaining deadlines in the Scheduling Order by extending such deadlines by sixty (60) days.

9. The parties respectfully request that the Scheduling Order be modified as follows:

Event	Current Date	Proposed New Date
Close of fact discovery regarding Rule 23 class action requirements.	December 17, 2024	February 15, 2025
Plaintiffs disclose experts concerning class certification, if any.	December 22, 2024	February 20, 2025
Defendants disclose experts concerning class certification, if any.	December 29, 2024	February 27, 2025
Plaintiffs disclose rebuttal experts concerning class certification, if any.	January 7, 2025	March 8, 2025
Close of expert discovery concerning class certification, if any.	January 28, 2025	March 29, 2025
Request for Admissions Deadline.	February 4, 2025	April 5, 2025
Plaintiffs shall move for Class Certification on or before this deadline; The Parties may file dispositive motions on or before this deadline.	March 10, 2025	May 9, 2025

Parties to submit a report 20 days after the Court rules on class certification and any summary judgment motion(s) proposing a schedule for further proceedings in light of the Court's rulings.	TBD	
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10. Moreover, the parties have exchanged sufficient discovery to be able to engage in a settlement conference, and the parties jointly request that the Court maintain the currently scheduled settlement conference on its docket at the date and time currently scheduled.

WHEREFORE, the parties respectfully request that this Court grant this Joint Motion to Modify Scheduling Order and extend all outstanding deadlines by sixty (60) days.

Date: December 19, 2024

Respectfully submitted,

/s/

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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of December, 2024, a copy of the foregoing Joint Motion to Modify Scheduling Order was served by electronic means via the Court's electronic filing system on all counsel of record.

Dated: December 19, 2024

/s/
Kimberly A. Manuelides (Bar No. . 23726)